

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION

UNITED STATES OF AMERICA,) No. 06-04070-01/02-CR-C-NKL
)
Plaintiff,) **Count One:** Both Defendants
) 21 U.S.C. § 846
v.) NMT 20 years and/or \$1 million
) Supervised Release: NLT 3 years
)
LARRY BUTTROM)
[DOB: 1956])
and)
JUSTIN LAMARR SIMPSON,) **Counts Two and Three:**
[DOB: 1982]) Count Two: BUTTROM only
) Count Three: SIMPSON only
Defendants.) 21 U.S.C. § 841(a)(1)
) NMT 20 years and/or \$1 million
) Supervised Release: NLT 3 years
)
) \$100 mandatory penalty assessment,
) each count, each Defendant herein

I N D I C T M E N T

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Conspiracy to Possess with Intent to Distribute
and Distribute MDMA and Marijuana)

From an unknown date, but at least from on or about March 1, 2006, and continuing to on or about July 9, 2006, in Boone County, in the Western District of Missouri, and elsewhere, LARRY BUTTROM and JUSTIN LAMARR SIMPSON, Defendants, did knowingly and intentionally combine, conspire, confederate and agree with each other, and with others known and unknown to the Grand Jury, to possess with intent to distribute and distribute a mixture and substance containing a detectable amount of 3,4-

Methylenedioxymethamphetamine/MDMA (Ecstasy), and a mixture and substance containing a detectable amount of marijuana, both Schedule I controlled substances; all in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

COUNT TWO

(Possession with Intent to Distribute
3,4-Methylenedioxymethamphetamine/MDMA
(Ecstasy) and Marijuana)

On or about July 8, 2006, in Boone County, in the Western District of Missouri, LARRY BUTTROM, Defendant, did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of 3,4-Methylenedioxymethamphetamine/MDMA (Ecstasy), and a mixture and substance containing a detectable amount of marijuana, both Schedule I controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT THREE

(Possession with Intent to Distribute
3,4-Methylenedioxymethamphetamine/MDMA
(Ecstasy) and Marijuana)

On or about July 9, 2006, in Boone County, in the Western District of Missouri, JUSTIN LAMARR SIMPSON, Defendant, did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of 3,4-Methylenedioxymethamphetamine/MDMA (Ecstasy), and a mixture and

substance containing a detectable amount of marijuana, both Schedule I controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

A TRUE BILL.

/S/

FOREPERSON OF THE GRAND JURY

/S/

JIM LYNN
Assistant United States Attorney
Missouri Bar No. 32140